

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 2005-
	:	DATE FILED: April 13, 2005
v.	:	VIOLATION:
JOHN GIAMBRONE	:	18 U.S.C. § 2314 (interstate transportation of stolen property -1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

1. Hynes Home Improvement ("HHI") was a roofing and home improvement business located at 119 Sibley Avenue, Ardmore, Pennsylvania.
2. Firsttrust Bank was a financial institution organized and operating under the laws of the United States, with branches located in the Eastern District of Pennsylvania.
3. HHI maintained a business checking account at Firsttrust Bank.
4. HHI was owned and operated by M.H. and J.H.
5. The defendant, JOHN GIAMBRONE, was employed by HHI as Controller/Business Manager/Bookkeeper. His responsibilities included maintaining the books, drafting checks, ordering supplies, paying expenses, and preparing and filing tax returns.
6. From on or about January 2000 to on or about March 2002, defendant JOHN GIAMBRONE, used his position at Hynes Home Improvement to defraud owners M.H. and J.H.
7. Defendant JOHN GIAMBRONE would present HHI checks made out to various credit card companies to M.H. and/or J.H. for their signature. M.H. and/or J.H. signed the

checks, assuming that they were for company expenses, without ever specifically enquiring about them.

8. These checks were not used to pay off company expenses. Rather, these checks were provided by defendant JOHN GIAMBRONE to another individual, M.W., who used them to pay off his credit card accounts.

9. Once the checks were received by the credit card companies, the companies deposited the checks and credited the accounts of M.W.

10. The total amount unauthorized checks that were used to pay off the accounts of M.W. was in excess of \$354,687.

11. In furtherance of the scheme, on or about each of the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

JOHN GIAMBRONE

unlawfully transported and transmitted, and caused to be transported and transmitted, in interstate commerce, from Arizona to Pennsylvania, securities with a value in excess of \$5,000.00, that is, the Hynes Home Improvement checks listed below (each of which was drawn on the Hynes Home Improvement account at Firsttrust Bank), knowing the same to have been stolen, converted and taken by fraud.

CHECK #	PAYEE	AMOUNT	BANK WHERE CHECK WAS DEPOSITED	DATE CLEARED
1992	Nextcard	\$3814.24	Wells Fargo Bank Phoenix, Arizona	11/29/00
2369	Nextcard	\$5254.58	Wells Fargo Bank Phoenix, Arizona	3/19/01
2848	Nextcard	\$5671.46	Wells Fargo Bank Phoenix, Arizona	7/17/01

2937	Nextcard	\$6244.12	Wells Fargo Bank Phoenix, Arizona	8/7/01
3294	Nextcard	\$3024.36	Wells Fargo Bank Phoenix, Arizona	11/7/01
3390	Nextcard	\$4012.56	Wells Fargo Bank Phoenix, Arizona	11/28/01
3442	Nextcard	\$5036.12	Wells Fargo Bank Phoenix, Arizona	12/11/01
3513	Nextcard	\$5012.64	Wells Fargo Bank Phoenix, Arizona	1/7/02
3626	Nextcard	\$2802.12	Wells Fargo Bank Phoenix, Arizona	2/12/02

In violation of Title 18, United States Code, Sections 2314 and 2.

PATRICK L. MEEHAN
United States Attorney